

## BALTIMORE CITY COUNCIL

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August 18, 2015

Chairman Tom Wheeler  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42,  
Telecommunications Carriers Eligible for Universal Service Support, WC Docket  
No. 09-197, Connect America Fund, WC Docket No. 10-90

Dear Chairman Wheeler,

As our City continues to recover from an economic recession, Lifeline has played an important role in helping low-income Baltimoreans overcome unemployment and other financial obstacles. Lifeline ensures access to vital communications services that connect many to education, employers, family, healthcare and emergency help. The FCC has done a remarkable job maintaining and updating the program since it was implemented over three decades ago.

I support the FCC's proposal to modernize Lifeline for the 21st Century including broadband services, but not at the expense of traditional phone services. Moreover, the monthly benefit amount currently allotted for voice would not be sufficient to support broadband service or a bundle of both voice and broadband. Currently qualified consumers may not be able to afford payments to get the additional service, and therefore possibly lower Lifeline participation rates.

Also, I am concerned about establishing a new system in which Lifeline benefits are directly given to customers through vouchers. Voucher systems can be subject to abuse and fraud. Currently Eligible Telecommunications Carriers (ETCs) have programs in place with well established guidelines to reach low-income individuals and households to qualify Lifeline participants.

The proposal to have the eligibility determinations made by either a government entity separate from the FCC or a third-party private entity under contract with the government is also concerning. ETC's should use personal identification requirements to prevent fraud without adding an unnecessary layer on the carrier and possible delays in service for consumers. Maryland ETCs already have a secure form to check eligibility for Lifeline; there is no need to change enrollment processes and add obstacles for the neediest members of our community.

I appreciate the opportunity to comment on the pending rules on Lifeline's modernization. It is an important program upon which many of our constituents rely for vital communications services.

Sincerely,



Mary Pat Clarke

14<sup>th</sup> District, Baltimore City Council